

Approx date 3/1/02

Chip and Wally

Here are our comments on the preliminary scoping document

General Comment The sole focus of this document is on the initial study area. Consideration of how to determine the true extent of the site should be included in this document especially regarding the consumption of fish. While some of the species proposed for evaluation have limited ranges, others do not. That needs to be considered.

Section 3.3, page 11, document states: "Bank fishing occurs along the Multnomah Channel outside the ISA." Bank fishing occurs at several locations throughout the ISA. It should be noted that especially some ethnic groups may fish at subsistence levels in the ISA. (This is considered later in the document).

Section 5.1, page 45-46, Identification of Potential Human Receptors - Residential: The indication that only trespassers and transients should be considered because much of the ISA is zoned industrial ignores a good body of evidence that indicates residents around the Cathedral Park/St. John Bridge and Swan Island Lagoon areas do utilize the Willamette for fishing and recreation.

In addition, the various ethnic groups that fish in the lower Willamette should be considered a significant potential human receptor. ATSDR considers them to potentially be the most affected receptor population and, as such, should be identified as a separate site use category.

Section 5.1.1, page 47, transient resident: assumed short-term exposure is not defined. Based on our observations and those of EPA staff, we believe it is likely for transients to live on the river banks (if not at the exact same location) for a period of more than one year.

Section 5.1.1, page 48, recreational angler: As documented in ATSDR's initial release of the Portland Harbor Public Health Assessment, there are recreational anglers that consume many more fish meals a year than the EPA guidance for recreational anglers and should be evaluated in the risk assessment.

Section 5.1.1, page 49, non-tribal consumption angler: the document states that the results of ATSDR's public health assessment will be used "to identify individual fish species consumed by non-tribal anglers." This information is not correct as it is based on the working draft of ATSDR's public health assessment. The Lower Willamette Group (LWG) needs to review the initial release of the Portland Harbor Public Assessment for ATSDR's evaluation of this issue.

Section 5.1.1, page 49-50, Evaluation of fish species for consumption: drops consideration of anadromous species except for lamprey. Since there are populations of salmonids spawn and grow up in the lower Willamette, this topic needs to be considered and dropped only if there is sufficient evidence in the literature. The effect of the site contaminants on these populations should be considered in the Ecological Risk Assessment.

Section 5.1.1, page 50, "Market Basket Approach" The FDA Market Basket Approach is based on many years of research and thus is carefully documented. The approach proposed here by LWG is presented without any documentation. It also ignores the basic approach of EPA and ATSDR to evaluating risk which is to focus on reasonable maximum exposure. The proposed approach would greatly underestimate the risk to anglers whose fish

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consumption is focused on only a few species. That this exists is documented in the Portland Harbor Public Health Assessment and the series of articles done by Daily Oregonian.

Section 7.0 References, page 56 As indicated in the document, the working draft of the Portland Harbor Public Health Assessment should not be cited. LWG was provided with several copies of the initial release of this document and it can be cited.

Table 5-1: for recreational angler, child should also be considered for fish consumption.

Thanks for the opportunity to review this document. Please contact us at the numbers below or by email.

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